

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

(1) VICTOR ARROYO,
A/K/A "KING VICIOUS,"
(2) ANGEL LUIS RIVERA,
A/K/A "KING VENOM,"
(3) ONIX FIGUEROA,
A/K/A "KING ONYX,"

04CR10053-RCL
Criminal No. _____

VIOLATIONS:

21 U.S.C. § 846--
Conspiracy to
Distribute Cocaine Base

21 U.S.C. § 846--
Conspiracy to distribute
Heroin

21 U.S.C. § 841(a)(1)--
Distribution of
Controlled Substances

18 U.S.C. § 2--Aiding
And Abetting

21 U.S.C. § 853--
Criminal Forfeiture
Allegation

SEAL
ORIGINAL

INDICTMENT

COUNT ONE: (21 U.S.C. § 846 -- Conspiracy To Distribute
Cocaine Base)

The Grand Jury charges that:

From a time unknown to the Grand Jury, but at least by in or
about January, 2003, and continuing thereafter until in or about
March, 2003, at Lawrence and elsewhere in the District of
Massachusetts,

(1) VICTOR ARROYO, A/K/A "KING VICIOUS," and,
(3) ONIX FIGUEROA, A/K/A "KING ONYX,"

the defendants herein, did knowingly and intentionally conspire
and agree with each other and with persons known and unknown to

the Grand Jury, to possess with intent to distribute, and to distribute, quantities of cocaine base, also known as "crack cocaine," in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further alleges that the conspiracy described herein involved at least 50 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (b)(1)(A)(iii).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO : (21 U.S.C. § 841(a)(1)-- Distribution of Cocaine Base; 18 U.S.C. §2--Aiding and Abetting)

The Grand Jury further charges that:

On or about January 29, 2003, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS,"

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

The Grand Jury further alleges that the transaction described herein involved at least 5 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841

(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1)-- Distribution of Cocaine Base; 18 U.S.C. §2--Aiding and Abetting)

The Grand Jury further charges that:

On or about February 1, 2003, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS,"

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

The Grand Jury further alleges that the transaction described herein involved at least 5 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841

(b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR : (21 U.S.C. § 841(a)(1)-- Distribution of Cocaine Base; 18 U.S.C. §2--Aiding and Abetting)

The Grand Jury further charges that:

On or about February 4, 2003, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS," and
(3) ONIX FIGUEROA, A/K/A "KING ONYX,"

the defendants herein, did knowingly and intentionally distribute a quantity of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

The Grand Jury further alleges that the transaction described herein involved at least 5 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE: (21 U.S.C. § 841(a)(1)-- Distribution of Cocaine Base; 18 U.S.C. §2--Aiding and Abetting)

The Grand Jury further charges that:

On or about February 11, 2003, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS,"

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base, also known as "crack cocaine," a Schedule II controlled substance.

The Grand Jury further alleges that the transaction described herein involved at least 5 grams of a mixture or a substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (b)(1)(B)(iii).

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIX: (21 U.S.C. § 846 -- Conspiracy To Distribute Heroin)

The Grand Jury charges that:

From a time unknown to the Grand Jury, but at least by in or about December, 2003, and continuing thereafter until on or about the date of this indictment, at Lawrence and elsewhere in the District of Massachusetts,

- (1) VICTOR ARROYO, A/K/A "KING VICIOUS," and,**
- (2) ANGEL LUIS RIVERA, A/K/A "KING VENOM,"**

the defendants herein, did knowingly and intentionally conspire and agree together, and with persons known and unknown to the Grand Jury, to possess with intent to distribute, and to distribute, quantities of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further alleges that the conspiracy described herein involved at least 100 grams of a mixture or a substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841 (b)(1)(B)(i).

All in violation of Title 21, United States Code, Section 846.

COUNT SEVEN: (21 U.S.C. § 841(a)(1)--Distribution of Heroin; 18 U.S.C. § 2--Aiding and Abetting)

The Grand Jury further charges that:

On or about December 26, 2003, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS," and,
(2)ANGEL LUIS RIVERA, A/K/A "KING VENOM,"

the defendants herein, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHT: (21 U.S.C. § 841(a)(1)--Distribution of Heroin; 18 U.S.C. § 2--Aiding and Abetting)

The Grand Jury further charges that:

On or about December 29, 2003, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS," and,
(2)ANGEL LUIS RIVERA, A/K/A "KING VENOM,"

the defendants herein, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT NINE: (21 U.S.C. § 841(a)(1)--Distribution of Heroin; 18
 U.S.C. § 2--Aiding and Abetting)

The Grand Jury further charges that:

On or about January 2, 2004, at Lawrence, in the District
of Massachusetts,

- (1) VICTOR ARROYO, A/K/A "KING VICIOUS," and,
- (2) ANGEL LUIS RIVERA, A/K/A "KING VENOM,"

the defendants herein, did knowingly and intentionally distribute
a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section
841(a)(1) and Title 18, United States Code, Section 2.

COUNT TEN: (21 U.S.C. § 841(a)(1)--Distribution of Heroin; 18 U.S.C. § 2--Aiding and Abetting)

The Grand Jury further charges that:

On or about January 6, 2004, at Lawrence, in the District of Massachusetts,

**VICTOR ARROYO, A/K/A "KING VICIOUS," and,
ANGEL LUIS RIVERA, A/K/A "KING VENOM,"**

the defendants herein, did knowingly and intentionally possess with intent to distribute and distribute, a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN: (21 U.S.C. § 841(a)(1)--Distribution of Heroin; 18 U.S.C. § 2--Aiding and Abetting)

The Grand Jury further charges that:

On or about January 16, 2004, at Lawrence, in the District of Massachusetts,

(1)VICTOR ARROYO, A/K/A "KING VICIOUS,"

defendant herein, did knowingly and intentionally distribute, a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts 1 through 10 of this Indictment,

- (1) VICTOR ARROYO, A/K/A "KING VICIOUS,"
- (2) ANGEL LUIS RIVERA, A/K/A "KING VENOM,"
- (3) ONIX FIGUEROA, A/K/A "KING ONYX,"

defendants herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds one or more of the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants --

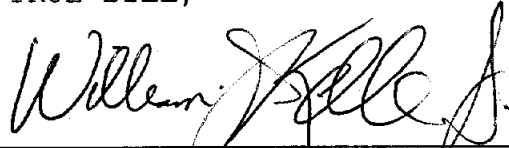
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

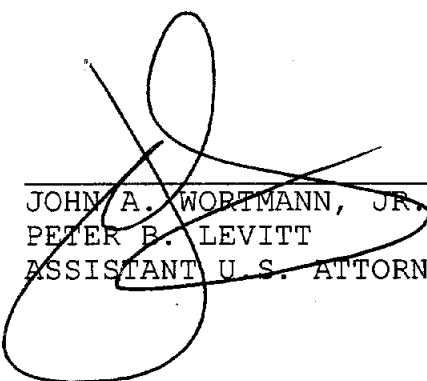
other property of the defendants up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL,



FOREPERSON OF THE GRAND JURY



JOHN A. WORTMANN, JR.
PETER B. LEVITT
ASSISTANT U.S. ATTORNEYS

DISTRICT OF MASSACHUSETTS

February 19 2004

Returned into the District Court by the Grand Jurors and
filed.



Deputy Clerk 12:20P

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Lawrence Category No. II Investigating Agency FBI

City Lawrence

Related Case Information:

County Essex

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name VICTOR M. ARROYO Juvenile: ☐ Yes ☒ No

Alias Name KING VICIOUS

Address 5 WASHINGTON WAY, LAWRENCE, MA

Birthdate: 1977 SSN 000 00 9768 Sex: MALE Race: Hispanic Nationalit US

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

AUSA Peter K. Levitt ; John A. Wortmann, Jr. Bar Number if applicable 565761 AND 534860

Interpreter: ☐ Yes ☒ No List language and/or dialect: _____

Matter to be SEALED: ☐ Yes ☒ No

☐ Warrant Requested ☐ Regular Process ☒ In Custody

Location Status:

Arrest Date _____

Already in Federal Custody as of _____ in _____

☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by: _____ on _____

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 11

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 2/19/04 Signature of AUSA: _____

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant VICTOR ARROYO AKA KING VICIOUS

		U.S.C. Citations	
	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 USC 846</u>	<u>CONSPIRACY DISTRIBUTE COCAINE BASE</u>	<u>1</u>
Set 2	<u>21 USC 846</u>	<u>CONSPIRACY DISTRIBUTE HEROIN</u>	<u>6</u>
Set 3	<u>21 USC 841(a)</u>	<u>DISTRIBUTION OF COCAINE BASE</u>	<u>2, 3, 4, 5,</u>
Set 4	<u>21 USC 841(a)</u>	<u>DISTRIBUTION OF HEROIN</u>	<u>7, 9, 10, 11,</u>
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: Lawrence Category No. II Investigating Agency FBICity Lawrence**Related Case Information:**County Essex

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:Defendant Name ANGEL LUIS RIVERA Juvenile: ☐ Yes ☒ NoAlias Name KING VENOMAddress 116 FORT PLEASANT STREET, SPRINGFIELD, MABirthdate: 1979 SS # 000 00 0268 Sex: MALE Race: Hispanic Nationalit US

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:AUSA Peter K. Levitt ; John A. Wortmann, Jr. Bar Number if applicable 565761 AND 534860Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested☐ Regular Process☒ In Custody**Location Status:**

Arrest Date _____

Already in Federal Custody as of _____ in _____

☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by: _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 5

Continue on Page 2 for Entry of U.S.C. Citations

X I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 2/19/04 Signature of AUSA: _____

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant ANGEL LUIS RIVERA AKA KING VENOM

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 USC 846</u>	<u>CONSPIRACY DISTRIBUTE HEROIN</u>	<u>6</u>
Set 2	<u>21 USC 841(a)</u>	<u>DISTRIBUTION OF HEROIN</u>	<u>7, 8, 9, 10</u>
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: Lawrence Category No. II Investigating Agency FBICity Lawrence Related Case Information:County Essex Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____**Defendant Information:**Defendant Name ONIX FIGUEROA Juvenile: ☐ Yes ☒ NoAlias Name KING ONYXAddress 80 FOURT STREET, LOWELL, MABirthdate: 1975 SS # 000 00 2664 Sex: MALE Race: Hispanic Nationalit US

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:AUSA Peter K. Levitt ; John A. Wortmann, Jr. Bar Number if applicable 565761 AND 534860Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☐ Regular Process ☒ In Custody**Location Status:**

Arrest Date _____

Already in Federal Custody as of _____ in _____

☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by: _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

X I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 2/19/04 Signature of AUSA: _____

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant ONIX FIGUEROA AKA KING ONYX

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21 USC 846</u>	<u>CONSPIRACY DISTRIBUTE COCAINE BASE</u>	<u>1</u>
Set 2	<u>21 USC 841(a)</u>	<u>DISTRIBUTION OF COCAINE BASE</u>	<u>4</u>
	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____